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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC. AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF THEIR
DISCOVERY LETTER BRIEF
REGARDING MOTION TO COMPEL
ADDITIONAL DEPOSITION OF
PIERRE-YVES DROZ AND EXHIBITS
THERE TO**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber Technologies, Inc. and
7 Ottomotto, LLC’s Administrative Motion to File Under Seal Portions of Their Discovery Letter Brief
8 Regarding Motion to Compel Additional Deposition of Pierre-Yves Droz and Exhibits Thereto (the
9 “Administrative Motion”). The Administrative Motion seeks an order sealing highlighted portions of
10 Uber’s Discovery Letter Brief Regarding Motion to Compel Additional Deposition of Pierre-Yves
11 Droz (“Uber’s Motion”) and of Exhibit 4 thereto, as well as the entirety of Exhibits 1, 3, and 6 thereto.

12 3. The portions of Uber’s Motion marked in red boxes and the green highlighted portions
13 of Exhibits 1, 3, and 6 contain or refer to trade secret and confidential business information, which
14 Waymo seeks to seal.

15 4. Uber’s Motion (portions marked in red boxes in version filed herewith) and Exhibits 1
16 and 6 (green highlighted portions in versions filed herewith) contain, reference, and/or describe
17 Waymo’s asserted trade secrets. The information Waymo seeks to seal includes the confidential
18 design and functionality of Waymo’s proprietary autonomous vehicle system, including its LiDAR
19 designs, which Waymo maintains as secret. I understand that these trade secrets are maintained as
20 secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo’s business (Dkt. 25-
21 31). The public disclosure of this information would give Waymo’s competitors access to
22 descriptions of the functionality or features of Waymo’s autonomous vehicle system. If such
23 information were made public, I understand that Waymo’s competitive standing would be
24 significantly harmed.

25 5. Exhibit 3 (green highlighted portions in version filed herewith) further contains,
26 references, and/or describes Waymo’s highly confidential and sensitive business information. Such
27 information includes details regarding Waymo’s security measures and protocols and detailed
28 computer forensics regarding access to Waymo’s trade secrets. I understand that Waymo maintains

1 that this information as confidential. The public disclosure of this information would cause significant
2 competitive harm to Waymo, as its security measures and computer forensics methods would become
3 known to competitors who could use such information to Waymo's disadvantage.

4 6. Waymo's request to seal is narrowly tailored to those portions of Uber's Motion and
5 Exhibits 1, 3, and 6 that merit sealing.

6
7 I declare under penalty of perjury under the laws of the State of California and the United
8 States of America that the foregoing is true and correct, and that this declaration was executed in San
9 Francisco, California, on August 14, 2017.

10 By /s/ Felipe Corredor

11 Felipe Corredor
12 Attorneys for WAYMO LLC

13
14 **ATTESTATION**

15 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
16 document has been obtained from Felipe Corredor.

17
18 By: /s/ Charles K. Verhoeven
19 Charles K. Verhoeven